

**To:** Shalev, Omer[Shalev.Omer@epa.gov]  
**From:** Sugerman, Rebecca  
**Sent:** Thur 3/24/2016 11:38:51 PM  
**Subject:** RE: Exide closure plan review

Sounds good.

I had a feeling that would be the story with the headers. She's probably right.

**From:** Shalev, Omer  
**Sent:** Thursday, March 24, 2016 4:38 PM  
**To:** Sugerman, Rebecca <Sugerman.Rebecca@epa.gov>  
**Cc:** Dadap, Nathan C. <DADAP.NATHAN@EPA.GOV>  
**Subject:** RE: Exide closure plan review

Thanks for your edits, we accepted nearly all of them with some minor tweaks.

The groundwater monitoring issue seems related to corrective action measures. We don't have too much time for review so I think we'll mention the groundwater issues and titling of appendices on a future call with DTSC.

Regarding the comment section headers, we actually had it sequential as you suggest, but Barbara wanted headers. We'll keep the headers for Tom and see what he would like to do. The comments are due on Monday.

Thanks again,

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**From:** Sugerman, Rebecca  
**Sent:** Thursday, March 24, 2016 1:33 PM  
**To:** Shalev, Omer <[Shalev.Omer@epa.gov](mailto:Shalev.Omer@epa.gov)>; Dadap, Nathan C.  
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**Subject:** Exide closure plan review

Looks good! I'm impressed at the review given the quick turn-around.

I have a few comments, attached.

Also - I did a quick read-through of the closure plan. Section 2.3.4.2 says the groundwater monitoring program is described in the Quarterly Groundwater Monitoring Report in Appendix C and Appendix X. I didn't look too closely, but those seem to be standard quarterly reports, that talk about results, rather than some sort of plan going forward. The document at Appendix X is a SAP, which is closer – but I didn't see anything that said: we will sample X wells for X amount of time at X frequency for X constituents, which is what I would expect to see. It might be there, I didn't spend too much time looking. But that seems like something that should be included.

In general I think a more detailed list of appendices would be helpful. For example, Appendix D is titled "Unit Descriptions and Work Breakdown Structures" – but then has 20 separate parts (at least that's how it is broken out on the DTSC website) describing up to 107 different units. Could we recommend they do subtitles, like "D.1 – Units 1 – 6", "D.2 – Units 6 – 8" or ... just something. Appx D is just an example, several of the appendices seem unwieldy as provided and could use tables of contents themselves.

Lastly – the format of the our comment letter. Normally I am a fan of headings, but these categories don't seem different enough to warrant it. Seems like comments in the order by section number might be clearer conceptually, though less attractive on paper – but I leave that up to you guys.

Rebecca Sugerman

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